

March 18, 2021

VIA ECF

The Honorable Barbara Moses
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Courtroom 20A
 New York, NY 10007

Re: *In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation*,
 Master File No. 1:17-cv-00916-RA-BCM

Dear Judge Moses:

Plaintiffs 683 Capital Partners, LP, Shipco Transport Inc., Sergey Regukh, Brian Armstrong, and E-Global Trade and Finance Group, Inc., (“Plaintiffs”) and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout (“Defendants” and with Plaintiffs, the “Parties”) submit this joint letter motion proposing to modify certain deadlines regarding expert discovery in the First Amended Scheduling Order (“First Scheduling Order”) entered on October 15, 2020 (ECF No. 210) and deadlines regarding *Daubert* and dispositive motions from the Court’s February 16, 2021 Order (“February Order”) (ECF No. 227).

On March 18, 2021, You Honor issued the Report and Recommendation regarding Plaintiffs’ amended motion for class certification, recommending that Judge Abrams grant the motion as to FXCM’s Class A common stock and deny the motion as to the 2.25% Convertible Senior Notes due 2018. (“Report and Recommendation”) (ECF No. 229). The Parties will not be objecting to the Report and Recommendation.

Given the Report and Recommendation, additional time is needed for the exchange of expert reports. Therefore, the Parties respectfully request the following modifications to the First Scheduling Order and February Order:

Event	Deadline from First Scheduling Order or February Order	Proposed Deadline
Opening expert reports	March 22, 2021	April 21, 2021
Rebuttal expert reports	May 11, 2021	June 10, 2021
Reply expert reports and close of all discovery	June 11, 2021	July 12, 2021
<i>Daubert</i> and dispositive motions due	August 10, 2021	September 9, 2021
Oppositions due	October 12, 2021	November 11, 2021
Replies due	November 12, 2021	December 13, 2021

This is the Parties' first request to modify the dates for opening and rebuttal expert reports and well as the briefing schedule for *Daubert* and dispositive motions. This is the Parties' second request to modify the deadline for reply expert reports and the close of all discovery. The Court granted the previous modification request.

A proposed scheduling order is submitted herewith. We thank the Court for its consideration of this request.

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

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